

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff	§	
	§	
v.	§	No.1:21-CR-0223-LY (2)
	§	
ROBERT REYES, Jr. (2)	§	

DEFENDANT’S SECOND UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL
AND RELATED DEADLINES

TO THE HONORABLE LEE YEAKEL, DISTRICT JUDGE, UNITED STATES
DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS, AUSTIN
DIVISION:

NOW COMES Robert Reyes, Jr., Defendant, by and through his attorney, Aaron
L. Wiley, and submits Defendant’s Unopposed Motion for Continuance of Trial and
Related Deadlines and, in support thereof, would show the following:

I.

On November 2, 2021, Mr. Reyes was charged in a sealed eight-count indictment
alleging conspiracy to commit wire fraud, wire fraud, and money laundering. (Doc. No.
3). On December 6, 2021, the Court granted the undersigned counsel’s Motion to Appear
Pro Hac Vice and counsel was added as lead attorney. (Doc. 50). Pursuant to the current
Scheduling Order this case has a hearing on all pending motions and docket call is
currently set for May 10, 2022, and the trial is scheduled for its current date of June 13,
2022. (Doc. No.55). On April 4th counsel for co-defendant Matthew Tunstall filed an

Agreed Motion to Continue Trial and Related Dates. (Doc. No. 59). The government has agreed to provide discovery in this matter. The Government provided its first batch of discovery materials on November 23, 2021 (comprising over 25,000 pages of data), and a second batch of discovery materials was provided on January 6, 2022 (comprising over 3 million pages of data). Given the volume of discovery that must be reviewed before motions can be filed and the matter tried, counsel requests an extension of all deadlines by at least 120 days to adequately investigate the case, draft, file appropriate motions, and to prepare for trial. To that end – the government is unopposed to a 120-day continuance of the Trial and Related Deadlines.

II.

Counsel for the defendant and the government are attempting to explore options to resolve this matter without the necessity of a trial. Once undersigned counsel can fully review all the discovery with Mr. Reyes, we will determine the best strategy about how to proceed in this matter. As a result - additional time is necessary for Mr. Reyes to make a fully informed, voluntary, and intelligent decision about how to proceed. This motion is not made for the purposes of delay, but in the furtherance of the interests of justice. Further, the government is unopposed to this request for continuance.

III.

Counsel has conferred with Rebecca Schuman Trial Attorney Criminal Division – Public Integrity regarding said motion, and she has no opposition.

IV.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this motion for a 120-day continuance of trial and all related deadlines be granted, and all associated trial deadlines be adjusted accordingly.

Respectfully submitted,

By: /s/ Aaron L. Wiley
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I certify that I previously conferred with Rebecca Schuman Trial Attorney Criminal Division – Public Integrity and she stated that the government has no opposition to the granting of this motion.

/s/ Aaron L. Wiley
Aaron L. Wiley

CERTIFICATE OF SERVICE

I certify that on May 3, 2022, I electronically filed this document with the Clerk of Court for the Western District of Texas, using the electronic case filing (ECF) system of the Court, and thereby served it on all counsels of record in this case.

/s/ Aaron L. Wiley
Aaron L. Wiley

